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PACIFIC BELL TELEPHONE COMPANY

19 **UNITED STATES DISTRICT COURT**
20 **EASTERN DISTRICT OF CALIFORNIA**

21 CALIFORNIA SPORTFISHING
22 PROTECTION ALLIANCE,

23 Plaintiff,

24 v.

25 PACIFIC BELL TELEPHONE COMPANY,

26 Defendant.

CASE NO. 2:21-cv-00073-JDP

**DECLARATION OF PETER C. MEIER IN
SUPPORT OF DEFENDANT PACIFIC
BELL TELEPHONE COMPANY'S
STATEMENT IN SUPPORT OF ENTRY OF
FINAL CONSENT DECREE**

Magistrate Judge: Hon. Jeremy D. Peterson

Complaint Filed: January 14, 2021

1 I, Peter C. Meier, hereby declare as follows:

2 1. I am a partner at the law firm of Paul Hastings LLP and counsel for Defendant Pacific
3 Bell Telephone Company ("Pacific Bell") in the above-captioned litigation. I submit this declaration
4 in support of Pacific Bell's Statement in Support of Entry of Final Consent Decree, submitted on
5 September 18, 2024. Unless otherwise indicated, I have personal knowledge of the matters set forth
6 below and, if called as a witness, I could and would testify competently thereto.

7 2. Attached as **Exhibit A** is a true and correct copy of the report titled "Evaluation of
8 Potential Public Health Impacts of Lead Presented by Lead-Clad Telecommunications Cables," by Dr.
9 David L. Eaton, Ph.D., DABT, FATS, NAM, Professor and Dean Emeritus, University of Washington,
10 dated September 2024.

11 3. Attached as **Exhibit B** is a true copy of the Expert Report of Dr. Rosalind Schoof, dated
12 September 6, 2024.

13 4. Attached as **Exhibit C** is a true copy of the Expert Report of Dr. Paul R. Krause, dated
14 September 6, 2024.

15 5. Attached as **Exhibit D** is a true copy of the Expert Report of Lawrence E. Eiselstein,
16 Ph.D., P.E., dated September 9, 2024.

17 6. Attached as **Exhibit E** is a true copy of the Expert Report of Tiffany Thomas, Ph.D.,
18 dated September 2024.

19 7. Attached as **Exhibit F** is a true copy of the Expert Report of Andrew Nicholson, Ph.D.,
20 dated September 9, 2024.

21 8. Attached as **Exhibit G** is a true copy of the Expert Report of Craig Jones, Ph.D., dated
22 September 6, 2024.

23 9. Attached as **Exhibit H** is a true copy of the Expert Report of Alex Revchuk, D.Env.,
24 P.E., BCES, dated September 6, 2024.

25 10. Attached as **Exhibit I** is a true copy of the Expert Report of Brian Drollette, Ph.D.,
26 dated September 9, 2024.

1 I declare under penalty of perjury that the foregoing is true and correct and that this declaration
2 was executed on September 18 2024, in San Francisco, California.

3
4 By: 
PETER C. MEIER